

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

WILLIE DENNIS,

Defendant.

20-cr-623 (JSR)

ORDER

JED S. RAKOFF, U.S.D.J.:

Per the request of pro se defendant Willie Dennis during the telephonic conference of October 4, 2022, see Tr. 48:6-8, the attached email correspondence that Mr. Dennis sent to the Court on, respectively, September 30, 2022 and October 1, 2022 -- even though sent without the Court's permission and in contravention of the Court's rules -- are hereby docketed and made part of the record.

SO ORDERED.

New York, NY  
October 6, 2022

  
JED S. RAKOFF, U.S.D.J.

## Rakoff NYSD Chambers

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**From:** Willie Dennis <woc2020@gmail.com>  
**Sent:** Friday, September 30, 2022 9:07 AM  
**To:** Rakoff NYSD Chambers  
**Cc:** Kushner, Sarah (USANYS); Daniel Chirlin; Jeffrey Skinner; Milt Williams; Willie Dennis  
**Subject:** Re: United Sates v. Dennis, 20-CR-623- Hurricane Ian - Conflict of Walden Macht & Harán

### CAUTION - EXTERNAL:

Your Honor,

This is my first opportunity to respond to Mr Williams as Hurricane Ian has hit Florida (1) where I am the primary caretaker of my elderly parents and we have lost power in the house. We had not completetd our conversation with respect to the subpoena of Mr Reynolds. Representations. have been made to me that Mr Reynolds had no knowledge of his name being placed on the No Contact List. I intended to ask Mr Williams the following which may avoid the need for the conference

1 Will you please confirm Mr Reynolds had no knowledge that his name was included on the No Contact List, which currently subjects me to arrest and incarceration should I contact Mr. Reynolds ?

2. Does Mr Reynolds have a relationship with any other person on the No Contact List ?

3. Is Mr Reynolds willing to provide me with a letter that simply states he had no knowledge of his name being on the No Contact List ?

These questions seek relevant information and should be answered before any motion to quash would be approved. Mr Williams should provide the answers in communications solely between the attorneys and avoid asking for a court conference prior to answering.

Finally Mr.Williams and Walden Macht & Harán LLP ( "Walden" ) are conflicted from representing Mr Reynolds in this matter. In 2019, I contacted Walden about representing me in my civil action against KL Gates. I provided Walden with confidential information that is relevant to the current criminal case. Walden reviewed the material, including the e-mail and ultimately declined to represent me. (2)

Willie Dennis  
646-509-6889  
woc2020@gmail.com

btw. I am presently out picking up some hot food for my parents and will lose my internet connection once I return home, so please excuse any delayed responses to e-mails.

### 1 Hurricane Ian

**Hurricane Ian** left more than 2.6 million homes without power while flooding coastal areas, destroying roads and threatening Florida's citrus crop as it battered through the state.

**(2); E-Mails to Walden Macht & Harán LLP in April 2019 Relating to Mr. Dennis' Criminal and Civil Matters**

**From:** Milton Williams <mwilliams@wmhlaw.com>  
**Date:** 29 April 2019 at 6:32:41 PM GMT-4

To: Willie Dennis <woc2020@gmail.com>  
Subject: RE: Rough Draft

Willie, I do not know enough to assess this, but my recommendation is that you need to get a matrimonial attorney as I am assuming (as you have not told me which court this is pending in) that this is in a matrimonial part. It looks fairly coherent, but this is not the format that it would need to be in for a state court proceeding.

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From: Willie Dennis <woc2020@gmail.com>  
Sent: Monday, April 29, 2019 6:21 PM  
To: Milton Williams <mwilliams@wmhlaw.com>  
Subject: Fwd: Rough Draft

Cook, chef chief bottle washer here

Below is my draft, I know it has a ways to go but I want to make sure I am not losing my audience or "rambling "about any, inconsequential,matters.

No pride in though, authorship,,or even order.

I am going to take a break and switch to " ask" piece and come back to it.

Thanks

Emergency Order to Show Cause

Your honor, please excuse me for my submission of this Emergency Order to Show Cause today, however a material adverse change in my monthly income and future income has occurred over the last 10 days as discussed below and events have overwhelmed me.

Since the Court requested full disclosure from me, with the assistance of certain partners of my Firm, about my compensation history as well as my anticipated future compensation ( See Court Report dated November 18 , 2019 ) submitted the same day in its entirety to the General Counsel of KL Gates, Jeffrey B Maletta ( See Exhibit A) and my subsequent refusal to submit an affidavit to the Court prepared by Mr Maletta which was not complete and accurate and could possibly be deemed misleading ( See Exhibit JM- Draft affidavit and my related e-mails to Mr Maletta on the subject ), certain partners of my Firm have taken retaliatory actions against me.

The " material " retaliatory acts include , among others, the following :

1 January 30, 2019-Loss of Resources and Destruction of all M relating to ( (I) my year long conversations with certain partners of my Firm relating to potential material conflicts between our Firm and certain clients, my compensation and potential fiduciary breaches by certain partners of the Firm and (ii and Court Records

On Wednesday January 30, 2019 at 1 :44am ( less than 70 days after the Court's request for discovery ), Mr Maletta, with no prior notice or legal reason provided informed me that as of that moment, I would no longer have access to any resources of the Firm, including my office. ( See Exhibit .... ) Six hours later Mr Maletta instructed the Technology Department of my Firm to destroy all the e-mails and documents on all my mobile devices.

The e-mails and documents destroyed included all my documentation relating to my year long conversations with certain partners of my Firm concerning (i) potential material conflicts between our Firm and certain clients, (ii) my compensation and (iii) potential fiduciary breaches by certain partners of the Firm.

Also destroyed on all my mobile devices were all my e-mails, filings and discovery material related to this three year modification process. ( See Exhibit ...)

Mr Maletta was clearly aware of the importance of the material after learning of my modification case Mr Maletta sent me the following e-mail

"From:  
Maletta,  
Jeffrey

Sent:  
Friday,  
November 16,  
2018  
10:42  
PM

To:  
Dennis,  
Willie  
E.

Subject  
: RE:  
Returned  
your  
call

Willie:

Sorry I  
missed  
you. We  
can  
talk  
later,  
but I  
wanted  
to touch  
base  
with  
you on  
two  
points.  
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obtained, and the personal and professional consequences that would flow from a bad outcome at the hearing could be very substantial.

Jeff'

Despite Mr Maletta's recognition in November that "the personal and professional consequences that would flow from a bad outcome at the hearing could be very substantial." He knows has provided

"From: Willie Dennis <[woc2020@gmail.com](mailto:woc2020@gmail.com)>  
Date: April 26, 2019 at 9:08:42 AM EDT  
To: "Milton L. Williams" <[Mwilliams@wmhlaw.com](mailto:Mwilliams@wmhlaw.com)>  
Subject: Fwd: Willie Dennis

Letter from lawyer to firm regarding improper disclosures

From: Paul Martin <[pmartinesq91@gmail.com](mailto:pmartinesq91@gmail.com)>  
Date: April 18, 2019 at 3:26:38 PM EDT  
To: Charles M Tea <[charles.tea@klgates.com](mailto:charles.tea@klgates.com)>  
Cc: Willie Dennis <[woc2020@gmail.com](mailto:woc2020@gmail.com)>  
Subject: Willie Dennis

Dear Mr. Tea,

As you are well aware for the past two months I have been requesting the emails which your office considered harassment, as well as, the emails between you and Mr. Dennis' wife divorce attorney Mr. Mueller. Despite your representations that there were only a few emails and that they were innocuous in nature you have yet to produce the emails? Further, as you are also aware, Mr. Dennis has to appear before a judge concerning his marital financial obligations, it is certainly relevant your firms treatment of Mr. Dennis and his ability to provide for his family. Certainly what you have told Mr. Dennis's clients is relevant to what he is going to tell the Judge concerning his ability to earn a living.

Now I have been informed that you are taking certain actions to expel Mr. Dennis from your firm. Please be aware that Mr. Dennis has been extremely prudent not to make false representations to the firms clients but your threats and baseless allegations would cause one to believe that your actions are pre textual and your reasoning for wanting Mr. Dennis departure is not all which you have stated in black and white. In any event I am still requesting the emails. Please provide in order that I may close out my file. "

Sent from my iPad

On 29 Sep 2022, at 3:09 PM, Milt Williams <mwilliams@wmhlaw.com> wrote:

Dear Judge Rakoff:

My colleagues and I at Walden Macht & Haran LLP represent Christopher Reynolds and Toyota in responding to the nonparty subpoena issued by Willie Dennis in *United Sates v. Dennis*, 20-CR-623 (attached to this email). We write to you regarding our clients' motion to quash the subpoena. We are moving to quash the subpoena, because it is unreasonable, oppressive, and otherwise lacks the requisite specificity.

We called and left a voicemail with Mr. Dennis on Tuesday September 27 at 12:35 pm EST. We also followed up via email later that day at 1:22 pm EST. Mr. Dennis responded via email on Wednesday September 28 at 9:12 am EST, saying that he would withdraw the subpoena if Mr. Reynolds agreed in writing to immediately request that his name be removed from the "No Contact list and that the Department of Justice provide [him] with the reason for the original inclusion of [his] name on the list." We replied to this email later that day at 2:47 pm EST, rejecting Mr. Dennis' offer, and asking for his availability for a call with the Court. We emailed Mr. Dennis again Thursday morning at 8:01 am EST. Mr. Dennis has not yet provided us with his availability. As the trial date is in the near future, we wanted to make the Court aware of our desire to move to quash this subpoena.

Respectfully,

**MILTON L. WILLIAMS JR.**  
**PARTNER**  
**WALDEN MACHT & HARAN LLP**  
250 Vesey, 27<sup>th</sup> Floor  
New York, New York 10281  
(212) 335-2963  
(917) 544-2389



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## Rakoff NYSD Chambers

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**From:** Willie Dennis <woc2020@gmail.com>  
**Sent:** Saturday, October 1, 2022 4:55 PM  
**To:** Rakoff NYSD Chambers  
**Cc:** Kushner, Sarah (USANYS); stephanie.simon2@usdoj.gov; Colson, Marguerite (USANYS); Patton, David (FD); Willie Dennis  
**Subject:** Re: U.S. v. Dennis, 20 Cr. 623 (JSR) - Request for Conference

### CAUTION - EXTERNAL:

Your Honor,

This is my first opportunity to respond to Mr Kelly as Hurricane Ian has hit Florida where I am the primary caretaker of my elderly parents and we had lost power until 7:04 pm last night. I will withdraw the subpoena for Mr Kelly's oral testimony if he agrees to provide an affidavit answering the following questions by the close of business on October 5, 2022.

During your representation of Mr Dennis:

1. why did you not issue any subpoenas on behalf of Mr. Dennis ?
2. why did you not file a "speedy trial" motion on behalf of Mr. Dennis ?
3. did you ask the Southern District of New York for information why the individuals on the No Contact List dated December 1, 2022 were included and, if the answer is "yes", identify what you were told in that regard
4. if you did not ask the Southern District of New York why the individuals on the No Contact List were included, why you did not.
5. why you never applied to remove any of the individuals listed on the No Contact List.
6. if you did not reply to the Southern District of New York requests for discovery from Mr Dennis, why not.
7. you indicated by e-mail dated June 17, 2022, you did not exchange any "written communication with Ralph Dawson or anyone else at Fulbright", did you or anyone in the office of the Federal Defenders of New York communicated with Ralph Dawson or anyone else at Norton Rose Fulbright and, if so, what were the contents of such communications.

These relevant questions should be answered before any motion to quash would be approved..Mr. Kelly should provide the answers in communications solely between the attorneys and avoid asking for a court conference prior to answering, particularly as I am representing myself pro se.

Respectfully submitted

Willie Dennis  
646-509-6889  
woc2020@gmail.com

### ( 1) No Contact List Dated December 1, 2022

From: Kushner, Sarah (USANYS) <Sarah.Kushner@usdoj.gov>  
Sent: Wednesday, December 1, 2021 3:31:32 PM  
To: Neil Kelly <Neil\_Kelly@fd.org>

Subject: No-Contact List

Neil,

Here is the current list of individuals on the "no-contact" list for Willie Dennis. I haven't sent to pretrial yet – just left a voicemail for Josh Rothman asking who Dennis's PTS officer is.

Thank you,  
Sarah

\*\*

CALVINA BOSTICK  
JOHN BICKS  
ROB MATLIN  
ERIC COTTLE  
PETER KALIS  
CHARLES TEA  
MELISSA TEA  
PAUL SWEENEY  
JILL LOUIS  
DAVID TANG  
NDENISARYA BREGASI  
ROSEMARY ALITO  
ANNETTE BECKER  
MICHAEL CACCESE  
MARY O'DAY  
BOB ZINN  
RICK GIOVANELLI  
KIM ASKEW  
MIKE ZANIC  
WHITNEY SMITH  
JAMES SEGERDAHL  
PALLAVI WAHI  
JEFFREY MALETTA  
CAROL LUMPKIN  
STEVE KAPLAN  
LAURENCE PLATT  
JOHN THOMPSON  
KEVIN CHAVERS  
BRAD SMITH  
DEV STAHLKOPF  
CHRIS REYNOLDS

**( 2) Oral Communications with Ralph Dawson of Norton Rose Fulbright**

**From:** Neil Kelly  
**Sent:** Friday, June 17, 2022 3:13 PM  
**To:** Willie Dennis <[woc2020@gmail.com](mailto:woc2020@gmail.com)>  
**Subject:** Request for materials

Mr. Dennis,

I understand you have requested certain materials our office has regarding your case. Please remember to send any such requests to me so I can address them directly.

I will be sending you the emails I exchanged with the prosecutor. We will likely post these on a Dropbox website as with the discovery documents. You already have all the emails I exchanged with Proskauer because you were cc'd on almost all of them (and I forwarded you the remainders), but I will send you those again as well.

**We have not exchanged any written communications with Mr. Dawson or anyone else at Norton Rose Fulbright.**

Sent from my iPad

On 30 Sep 2022, at 1:41 PM, Neil Kelly <Neil\_Kelly@fd.org> wrote:

Judge Rakoff's Chambers,

I write pursuant to Rule 2(c) of the Court's Individual Rules of Practice to respectfully request that the Court convene a telephonic conference in the above-captioned matter regarding the request of non-party Neil Kelly to quash the testimonial portion of the attached subpoena. (We have already produced documents in response to the documentary portion of the subpoena.) I sent emails to Mr. Dennis on the evening of Wednesday, September 28, and morning of Friday, September 30, and left a voicemail for Mr. Dennis on the afternoon of Thursday, September 29, requesting Mr. Dennis's availability for a call with Chambers to discuss this application, but have not received a response.

I am available for a call with Chambers the afternoon of Monday, October 3; between 11:30 a.m. and 2:00 p.m. on Tuesday, October 4; and between 10:00 a.m. and 1:00 p.m. on Wednesday, October 5. The Government has indicated it can be available during these times as well.

Please let me know if the Court requests any additional information at this time.

Respectfully,

Neil P. Kelly | Assistant Federal Defender

**Federal Defenders of New York, Inc.**

52 Duane Street, 10th Floor

New York, NY 10007

Office: (212) 417-8744

Cell: (646) 335-3785

[neil\\_kelly@fd.org](mailto:neil_kelly@fd.org)

<Dennis Subpoena.pdf>

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